

1 **E. BRENT BRYSON, ESQ.**

Nevada Bar No. 004933

2 **E. BRENT BRYSON, LTD.**

3 375 E. Warm Springs Rd., Suite 104

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5 Ebbesqltd@yahoo.com

6 *Attorney for All Defendants*

7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9 SONIA FELDMAN,

10 Plaintiff,

11 vs.

12 MARK ANTHONY SAWYER; JENNIFER
ANN SAWYER; NEVADA MJS TRUST;
13 THE PROPERTY LOCATED AT 6940 N.
JENSEN STREET, LAS VEGAS, NV
14 89149-1365; THE PROPERTY LOCATED
AT 508 SETTING MOON STREET,
15 NORTH LAS VEGAS, NV 89084-1258;
THE VACANT LAND LOCATED AT
16 APN# 125-19-203-002; ATD COMMERCE,
LLC.; ACM NORTH, LLC; MAS
17 HOLDINGS GROUP, LLC., and SAWYER
HOLDINGS, LLC.,

18
19
20 Defendants.

Case No. 2:24-cv-00526-JCM-MDC

**MOTION TO WITHDRAW AS COUNSEL
FOR ALL DEFENDANTS**

21 COMES NOW, E. Brent Bryson, Esq. of the law firm of E. Brent Bryson, Ltd., attorney
22 of record for all Defendants, and pursuant to F.R.C.P. Rule 7(b) and Local Rule IA-6(b), files this
23 MOTION TO WITHDRAW AS COUNSEL FOR ALL DEFENDANTS. This motion is made
24 and based upon the following memorandum of points and authorities, the papers and pleadings on
25 file herein, the Declaration of E. Brent Bryson, Esq. attached hereto, together with any oral
26 argument at the time of hearing, if any.
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DATED this 4th day of December, 2024.

E. BRENT BRYSON, ESQ.

/s/ E. Brent Bryson, Esq.

E. BRENT BRYSON, ESQ.

Nevada Bar No. 004933

Attorney for All Defendants

MEMORANDUM OF POINTS AND AUTHORITIES

I. LAW

A. F.R.C.P. RULE 7(b)(1)(2) MOTIONS AND OTHER PAPERS states:

(1) In General. A request for a court order must be made by motion. The motion must: (A) be in writing unless made during a hearing or trial; (B) state with particularity the grounds for seeking the order; and (C) state the relief sought.

(2) Form. The rules governing captions and other matters of form in pleadings apply to motions and other papers.

B. F.R.C.P. LOCAL RULE IA-6 APPEARANCES, SUBSTITUTIONS, AND WITHDRAWALS states in relevant part:

(b) If an attorney seeks to withdraw after appearing in a case, the attorney must file a motion or stipulation and serve it on the affected client and opposing counsel. The affected client may, but is not required to, file a response to the attorney's motion within 14 days of the filing of the motion, unless the court orders otherwise.

...

(e) Except for good cause shown, no withdrawal or substitution will be approved if it will result in delay of discovery, the trial, or any hearing in the case. Where delay would result, the papers seeking leave of the court for the withdrawal or substitution must request specific relief from the scheduled discovery, trial, or hearing. If a trial setting has been made, an additional copy of the moving papers must be provided to the clerk for immediate delivery to the assigned district judge, bankruptcy judge, or magistrate judge.

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1 **II. ARGUMENT**

2 In the instant case, the undersigned counsel respectfully requests this Honorable Court
3 grant the law offices of E. Brent Bryson, Ltd. and E. Brent Bryson, Esq. leave to withdraw as
4 attorney of record all Defendants because of Defendants' failure to communicate to this counsel
5 and for Defendants' failure to adequately retain this counsel for this case.
6

7 Defendants have has been informed of this Counsel's intent to withdraw from this matter.
8 Withdrawal can be accomplished without material adverse effect on the interests of Defendants as
9 the last pleading was filed on October 15, 2024, Stipulated Discovery Plan and Scheduling Order
10 [ECF No.: 29], with discovery cutoff set for March 10, 2025, and a joint pretrial order due by/on
11 May 9, 2025.
12

13 Defendants' last known mailing addresses and email addresses can be used to serve
14 Defendants with notice of further proceedings taken in this action and are as follows:

15 MARK SAWYER
16 6940 N JENSEN ST
17 LAS VEGAS, NV 89149
Email: msawyer2729@yahoo.com

18 JENNIFER SAWYER
19 6940 N JENSEN ST
20 LAS VEGAS, NV 89149
Email: jen61002@hotmail.com

21 NEVADA MJS TRUST
22 6940 N JENSEN ST
LAS VEGAS, NV 89149

23 THE PROPERTY LOCATED AT:
24 508 SETTING MOON STREET
NORTH LAS VEGAS, NV 89084-1258

25 ATD COMMERCE, LLC.
26 C/o US CORPORATE SOLUTIONS, LLC.
27 2685 S. Rainbow Blvd., Suite 213
Las Vegas, NV 89146

28 ///

1 ACM NORTH, LLC.
2 C/o US CORPORATE SOLUTIONS, LLC.
3 2685 S. Rainbow Blvd., Suite 213
4 Las Vegas, NV 89146

5 MAS HOLDINGS GROUP, LLC.
6 C/o US CORPORATE SOLUTIONS, LLC.
7 2685 S. Rainbow Blvd., Suite 213
8 Las Vegas, NV 89146

9 SAWYER HOLDINGS, LLC.
10 C/o JEFFREY BURR, LTD.
11 2600 Paseo Verde Pkwy., Suite 200
12 Henderson, NV 89074

13 Defendants have been served a copy of this Motion by placing the Motion in sealed
14 envelopes, postage prepaid, and mailed via USPS mail and emailed to Defendants' last known
15 address as indicated above.

16 **III. CONCLUSION**

17 That based upon the forgoing, this Counsel respectfully requests leave to withdraw as
18 counsel of record for all Defendants.

19 DATED this 4th day of December, 2024.

20 **E. BRENT BRYSON, ESQ.**

21 /s/ E. Brent Bryson, Esq.

22 **E. BRENT BRYSON, ESQ.**

23 Nevada Bar No. 004933

24 **E. BRENT BRYSON, LTD.**

25 375 E. Warm Springs Rd., Suite 104

26 Las Vegas, Nevada 89119

27 (702) 364-1234 Telephone

28 (702) 364-1442 Facsimile

Ebbesqltd@yahoo.com

Attorney for All Defendants

CERTIFICATE OF SERVICE

I hereby certify that on the 4th day of December, 2024, a true and correct copy of the foregoing **MOTION TO WITHDRAW AS COUNSEL FOR ALL DEFENDANTS** was electronically filed and served via the Court's CM/ECF system on all parties currently on the electronic service list including:

MACHAT & ASSOCIATES, P.C.

MICHAEL MACHAT, Esq.

California Bar No. 109475

Appearing Pro Hac Vice

8730 W. Sunset Blvd., Ste. 250

W. Hollywood, California 90069

Telephone: (310) 860-1833

michael@machatlaw.com

Attorneys for Plaintiff

ALBRIGHT STODDARD, WARNICK & ALBRIGHT

G. MARK ALBRIGHT, ESQ. (1394)

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gma@albrightstoddard.com

dormsby@albrightstoddard.com

kfenton@albrightstoddard.com

Attorneys for Plaintiff

And a copy of the foregoing **MOTION TO WITHDRAW AS COUNSEL FOR ALL DEFENDANTS** was also served by mail via the United States Postal Service, in a sealed envelope, postage prepaid, to the Defendants' last known address on December 5, 2024:

MARK SAWYER

6940 N JENSEN ST

LAS VEGAS, NV 89149

Email: msawyer2729@yahoo.com

JENNIFER SAWYER

6940 N JENSEN ST

LAS VEGAS, NV 89149

Email: jen61002@hotmail.com

1 NEVADA MJS TRUST
2 6940 N JENSEN ST
3 LAS VEGAS, NV 89149

4 THE PROPERTY LOCATED AT:
5 508 SETTING MOON STREET
6 NORTH LAS VEGAS, NV 89084-1258

7 ATD COMMERCE, LLC.
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9 2685 S. Rainbow Blvd., Suite 213
10 Las Vegas, NV 89146

11 ACM NORTH, LLC.
12 C/o US CORPORATE SOLUTIONS, LLC.
13 2685 S. Rainbow Blvd., Suite 213
14 Las Vegas, NV 89146

15 MAS HOLDINGS GROUP, LLC.
16 C/o US CORPORATE SOLUTIONS, LLC.
17 2685 S. Rainbow Blvd., Suite 213
18 Las Vegas, NV 89146

19 SAWYER HOLDINGS, LLC.
20 C/o JEFFREY BURR, LTD.
21 2600 Paseo Verde Pkwy., Suite 200
22 Henderson, NV 89074

23 /s/Ronald J. Hirsch
24 An Agent and/or Employee of E. BRENT BRYSON, LTD.
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DECLARATION OF E. BRENT BRYSON, ESQ.

STATE OF NEVADA)
) ss:
COUNTY OF CLARK)

I, E. BRENT BRYSON, ESQ., do hereby declare, under penalty of perjury under the laws of the State of Nevada, that the following statements are true and correct:

1. That Declarant is over the age of eighteen (18), is an attorney duly licensed to practice law in the State of Nevada and maintains offices at 375 E. Warm Springs Road, Suite 104, Las Vegas, NV 89119, is the attorney of record for the all Defendants in this action, and has personal knowledge as to the facts contained herein and will testify as to these facts if called upon to do so;

2. That this motion is brought because of Defendants' failure to communicate to this Counsel and for Defendants' failure to adequately retain this Counsel for this case;

3. That due to these circumstances, it is in the best interests of Defendants that they be allowed to find new counsel as soon as possible. Defendants have been informed of this Counsel's intent to withdraw as counsel in this matter;

4. That withdrawal can be accomplished without material adverse effect on the interests of the Defendants as the last pleading was filed on October 15, 2024, a Stipulated Discovery Plan and Scheduling Order [ECF No.: 29], with discovery cutoff set for March 10, 2025, and a joint pretrial order due by/on May 9, 2025;

5. That to the best of Declarant's knowledge and belief, the last known mailing address and email address at which all Defendants can be served with notice of further proceedings taken in this action are as follows:

MARK SAWYER
6940 N JENSEN ST
LAS VEGAS, NV 89149
Email: msawyer2729@yahoo.com

JENNIFER SAWYER
6940 N JENSEN ST
LAS VEGAS, NV 89149
Email: jen61002@hotmail.com

NEVADA MJS TRUST
6940 N JENSEN ST
LAS VEGAS, NV 89149

THE PROPERTY LOCATED AT:
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2685 S. Rainbow Blvd., Suite 213
Las Vegas, NV 89146

MAS HOLDINGS GROUP, LLC.
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Las Vegas, NV 89146

SAWYER HOLDINGS, LLC.
C/o JEFFREY BURR, LTD.
2600 Paseo Verde Pkwy., Suite 200
Henderson, NV 89074

6. That Declarant has served a copy of this Motion to all Defendants by placing the Motion in a sealed envelope, postage prepaid, and mailed via USPS to Defendants' last known address above in Paragraph 5;

7. That based upon the forgoing, Declarant respectfully requests leave to withdraw as counsel of record for all Defendants;

8. That Declarant has read the foregoing Motion to Withdraw as Counsel for All Defendants and knows the contents thereof, and that the same is true to the best of Declarant's

1 own knowledge except for those matters therein stated upon information and belief, and as for
2 those matters, Declarant believes them to be true.

3 **FURTHER DECLARANT SAYETH NOT.**

4 DATED this 4th day of December, 2024.

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6 /s/ E. Brent Bryson, Esq.
7 E. BRENT BRYSON, ESQ.
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